## EXHIBIT I

Declaration of Omar Gonzalez-Pagan in support of Motion to Exclude Expert Testimony of Dr. Paul R. McHugh *Kadel v. Folwell*, No. 1:19-cv-00272-LCB-LPA (M.D.N.C.)

March 22, 2017

To Whom It May Concern,

Dr. Paul McHugh and Dr. Lawrence Mayer's Fall 2016 report, "Sexuality and Gender: New Findings from the Biological, Psychological and Social Sciences," published in the 50th issue of the non-peer reviewed bioethics magazine The New Atlantis, misleads readers about the state of scientific research and evidence-based clinical practice guidelines addressing the health of people who are lesbian, gay, bisexual, transgender and queer (LGBTQ).

As researchers with expertise in gender and sexuality, and/or as clinicians who serve LGBTQ people, we are called to correct the record. A substantial body of research points to stigma and its consequences as contributing to the mental and physical health disparities among LGBTQ people. Based on scientific consensus, many major medical associations have issued guidelines and policy statements calling for clinicians to affirm and support the sexual orientation, gender identity and gender expression of their patients as part of a standard, evidence-based approach to high quality, patient-centered healthcare. 17-25

Although the "Sexuality and Gender" report cites many peer-reviewed scientific articles, the interpretation, analysis, and summary of the scientific evidence in the report has not been peer-reviewed. As scientific and medical experts, we affirm that the report's conclusions do not reflect current scientific or medical consensus about sexual orientation or gender identity research findings or clinical care recommendations. As such, the report's conclusions should not be viewed as a source of scientific or medical justification to support any legislation, judicial action, policymaking or clinical decision-making affecting the lives of LGBTQ people or their families.

In summary, as researchers and clinicians with expertise in gender and sexuality, we affirm that the "Sexuality and Gender" report does not represent prevailing expert consensus opinion about sexual orientation or gender identity related research or clinical care.

Signed,

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